

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC., et al., :

Debtors.

Chapter 11 Case. No.

08-13555 (SCC)

(Jointly Administered)

I, NEIL R. LIEBERMAN, declare under penalty of perjury as follows:

1. I am a member of the law firm of Holwell Shuster & Goldberg LLP, counsel for Wilmington Trust, National Association, solely in its capacity as Trustee for SASCO 2006-S4 (the “Trustee”), in the above-captioned action, and am admitted to practice before this Court. I submit this declaration in support of the *Objection of Wilmington Trust, National Association, as Trustee for Structured Assets Securities Corporation Mortgage Pass-Through Certificates, Series 2006-S4, to Lehman Brothers Holdings Inc.’s Motion to Estimate RMBS Claims for SASCO 2006-S4 for Reserve Purposes Pursuant to 11 U.S.C. § 502(c) and Cross-Motion to Estimate RMBS Claims for SASCO 2006-S4 for Reserve Purposes and for Relief from the Protocol Order.*

2. Attached hereto as Exhibit 1 is a true and correct copy of the Trust Agreement for Structured Asset Securities Corporation Mortgage Pass-Through Certificates Series 2006-S4, dated as of December 1, 2006.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Prospectus Supplement for Structured Assets Securities Corporation Mortgage Pass-Through Certificates, Series 2006-S4, dated December 21, 2006.

4. Attached hereto as Exhibit 3 is a true and correct copy of the Mortgage Loan Sale and Assignment Agreement for Structured Assets Securities Corporation Mortgage Pass-Through Certificates, Series 2006-S4, dated as of December 1, 2006.

5. Attached as Exhibit 4 is a true and correct copy of a letter from the Trustee to the Institutional Investors and the LBHI Investors, dated June 22, 2017.

6. Attached as Exhibit 5 is a true and correct copy of the Deed of Trust for loan number XXXXXX0477.

7. I declare under the penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
February 28, 2018

A handwritten signature in cursive script, appearing to read "N. R. Lieberman", written over a horizontal line.

Neil R. Lieberman